

IN RE:
KAREN BARRETO CRUZ
XXX-XX-5348

CASE NO. 19-06490-ESL

CHAPTER 13

DEBTOR (S)

TRUSTEE'S OBJECTION TO CLAIM #13-1
FILED BY (OR ON BEHALF OF): CONSEJO DE TITULARES CON CALA DE HUCARES
TO THE HONORABLE COURT:

NOW COMES Jose R. Carrion, Chapter 13 Trustee, and very respectfully alleges and prays:

The Trustee objects to Claim #13-1, filed on April 21, 2020 for the amount of \$12,000.00, classified as SECURED on the following grounds:

- Failure to comply with Fed. R. Bankr. P. 3001(c) (2) (B)-Secured creditor failed to attach to the proof of claim a statement of the amount necessary to cure any default as of the date of the petition.

WHEREFORE the Trustee respectfully prays that this motion be granted for the reason herein set forth and that an order be entered:

Reclassifying objected claim as a general unsecured claim.

NOTICE: Within thirty (30) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the clerk's office of the United States Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the objection will be deemed unopposed and may be granted unless: (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3) in the opinion of the court, the interest of justice requires otherwise. If you file a timely response, the court may schedule a hearing.

In San Juan, Puerto Rico this Friday, October 9, 2020.

/s/ Jose R. Carrion
JOSE R. CARRION
CHAPTER 13 TRUSTEE
PO Box 9023884, Old San Juan Stat.
San Juan, PR 00902-3884
Tel. (787) 977-3535
Fax (787) 977-3550

ESP

VERIFIED STATEMENT

The undersigned, of legal age and as employee of Jose R. Carrion, Chapter 13 Trustee Office, hereby certifies that on this same date, I personally and duly notified a true and exact copy of the attached motion to each party below listed.

KAREN BARRETO CRUZ
325 E CYPRESS STREET
KENNETT SQUARE, PA
19348-3176

CONSEJO DE TITULARES CON CALA DE HUCAR
PO BOX 1032
NAGUABO, PR 00718

JOSE A LEON LANDRAU*
PO BOX 1687
CAGUAS, PR 00726-1687

In San Juan, Puerto Rico this Friday, October 9, 2020.



Chapter 13 Clerk